

**CALIFORNIA NUTRITION NETWORK FOR HEALTHY, ACTIVE FAMILIES**  
**FOOD STAMP NUTRITION EDUCATION (FSNE)**  
**ALLOWABLE AND UNALLOWABLE COSTS**  
**BASED ON USDA GUIDELINES FFY 2006**

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*THIS DOCUMENT IS AN INTERNAL DOCUMENT TO BE USED BY CPNS STAFF ONLY AND NOT TO BE SENT TO NETWORK LOCAL INCENTIVE AWARDEE OR SPECIAL PROJECTS.*

*IT IS NOT A COMPREHENSIVE LIST OF ALLOWABLES AND UNALLOWABLES. FOR FURTHER INFORMATION, PLEASE REFER TO THE FOOD STAMP NUTRITION EDUCATION PLAN GUIDANCE, FEDERAL FISCAL YEAR 2006.*

## ALLOWABLE AND UNALLOWABLE COSTS

### USDA GUIDELINES FFY 2006

USDA rules for allowable and unallowable costs apply equally to state and federal match.

All activities and materials must be reasonable and necessary and targeted to persons participating in or eligible for the United States Department of Agriculture (USDA) Food Stamp Program. Eligibles are defined as persons who meet the criteria for participation in the Food Stamp Program or have incomes not higher than 130 percent of Federal Poverty Level (FPL). Activities may also be delivered with a waiver to potentially eligible target audiences with at least 50 percent having household incomes of not higher than 185 percent of the FPL. (Waiver to USDA will be completed by CPNS staff). Activities in School Districts or organizations working with schools, must have over 50 percent of the students enrolled in the free or reduced price school meal program at each participating school site to qualify. College students must be at 130 percent of FPL and meet at least one other USDA criteria. (See pages 8- 9)

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>1. EQUIPMENT</b>	
<ul style="list-style-type: none"><li>▪ Purchase of office or electronic equipment. (such as computers TV, VCR, cameras, etc). A public organization may donate equipment and use fair market value; however, any fair market value must be adjusted to reflect equipment provided by federal funding. (Multiplying the fair market value times the percentage share invested in the equipment may factor this value.)</li><li>▪ All equipment must be reasonable, necessary, and integral to the nutrition education activity. If the equipment is also being used to support other activities, or not being used by 100% FTE staff, the costs must be prorated.</li><li>▪ Equipment purchased with State Match funds may be returned to the State at the request of the <i>Network</i> if the project is terminated or the Contractor no longer participates in the <i>Network</i>.</li><li>▪ Only one salad bar per contract for educators to use for nutrition education.</li><li>▪ Purchase of cooking/food demonstration carts for nutrition education.</li><li>▪ Kitchen appliances only with justification of reasonable and necessary need.</li></ul>	<ul style="list-style-type: none"><li>▪ Electronic or office equipment that exceeds prior approval thresholds (i.e., \$5,000) unless such prior approval is received from the <i>Network</i>.</li><li>▪ Purchasing food service equipment for food service use.</li><li>▪ Medical equipment.</li></ul>

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>2. FOOD DEMONSTRATION</b>	
<ul style="list-style-type: none"> <li>▪ Cost of food for recipe/taste testing purposes that promotes healthy food (especially fruits and vegetables). Cost of kitchen equipment and dishes necessary for food storage, preparation, and demonstration purposes.</li> <li>▪ Equipment costs must be prorated to reflect the FSNE portion only, if other programs or projects use the equipment.</li> <li>▪ Cost for food <u>samples</u> associated with a nutrition education lesson.</li> <li>▪ Staff time to prepare, serve and clean-up food for demonstration and/or taste testing purposes.</li> <li>▪ Food may be donated, but the actual cost may not be leveraged or claimed on any FSNE budget.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ongoing snack or food service.</li> <li>▪ Meal size portions or complete meal service, including “training table meals”. (<u>Portions sizes must be limited to taste test sample sizes, and can not be snacks, partial meals, or complete meal service.</u>)</li> <li>▪ Cost of food provided as groceries or supplemental food.</li> <li>▪ Distributing or providing meals or snacks to eligibles, for attendance of nutrition education classes. Also, incentive payments to encourage attendance at nutrition education classes or focus groups.</li> <li>▪ Use of staff time to prepare or serve meals or developing food or produce displays. Snacks, meals, or food/fruit for decoration or display purposes</li> </ul>

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>3. FOOD STAMP PROMOTION, OUTREACH AND FOOD SECURITY</b>	
<ul style="list-style-type: none"> <li>▪ A brief message about the Food Stamp Program must be provided on all newly developed or reprinted materials. The following is recommended: “The Food Stamp Program provides nutrition assistance to people with low income. It can help you buy nutritious foods for a better diet. To find out more, contact [enter your local office or toll-free number, or other useful information to help identify how to get services].”</li> <li>▪ USDA asks that all nutrition education efforts include a <i>brief</i> Food Stamp Program (FSP) outreach message. Activities that provide more than a brief promotion message may be funded through the State’s FSP Outreach Plan or through regular FSP administrative funding.</li> <li>▪ Within the context of a nutrition education intervention, staff may promote ideas for improving access to healthier foods in low-income communities, but may not use FSNE funds to actively increase food security.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Any activity or set of activities in which the primary objective is to increase participation in the Food Stamp Program through individual applicant assistance, community-based outreach message dissemination, or facilitation of systemic changes in Food Stamp Program that enhance program accessibility (Outreach). Examples of unallowable outreach activities include:               <ul style="list-style-type: none"> <li>▪ Pre-screening or assisting individuals with completing Food Stamp Program applications and obtaining verification;</li> <li>▪ Accompanying individuals to the Food Stamp Program office to assist with the application process;</li> <li>▪ Conducting outreach workshops for members of community organizations that serve low-income people;</li> <li>▪ Convening meetings that focus exclusively or primarily on Food Stamp Program Outreach and increasing Food Stamp Program participation;</li> <li>▪ Reimbursing the mileage for outreach training or meeting attendance;</li> </ul> </li> <li>▪ Producing and distributing print materials (e.g. brochures, posters) that are primarily Food Stamp Program outreach in nature;</li> <li>▪ Developing and placing print, radio, television media advertisements to be used as public service announcements to educate potential applicants about Food Stamp Program;</li> <li>▪ Designing an Food Stamp Program Outreach program, including the development, publication, and distribution of materials to the community;</li> <li>▪ Building Food Stamp Program promotion/outreach teams, steering committees, coalitions, etc. and providing Food Stamp Program outreach guidance to other State and local organizations;</li> </ul>

<u><b>ALLOWABLE</b></u>	<u><b>UNALLOWABLE</b></u>
	<ul style="list-style-type: none"> <li>▪ Working with local agencies to plan and implement Food Stamp Program Outreach and Program; Accessing strategies, as well as monitoring and/or evaluating agencies' outreach performance;</li> <li>▪ Funding State or local staff to develop, implement, or oversee Food Stamp Program Outreach activities;</li> <li>▪ Costs for the following are neither reimbursable through Food Stamp Program promotion nor Food Stamp Program Outreach: <ul style="list-style-type: none"> <li>- Implementing "Direct Certification" of Food Stamp Program households for other programs.</li> <li>- Outreach and recruitment for non-Food Stamp programs (e.g. School breakfast Program, National School Lunch Program or WIC).</li> <li>- Implementing environmental or systematic changes and strategies, in which the primary objective is to increase participation in a non-FOOD STAMP program.</li> <li>- States may not use FSNE funds for local community food security and needs assessments, except where such an activity is of minimal or no cost and is integral to general FSNE nutrition education program planning.</li> </ul> </li> <li>- FSNE funds may not be used to actively promote and conduct outreach for the FSP, the National School Lunch Program, the School Breakfast Program, and other FNS programs. Brief messages identifying these as sources of food assistance are allowable.</li> </ul>

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>4. GARDENING</b>	
<ul style="list-style-type: none"> <li>▪ Educational supplies, curricula and staff salaries to teach gardening concepts as part of nutrition education efforts that reinforce the beneficial nutrition aspects of gardening.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The cost for the rental or purchase of garden equipment (fertilizer, tractors), the purchase or rental of land for garden plots, seeds, plants, and other gardening supplies are not allowable costs.</li> <li>▪ Costs associated with creating, implementing, and maintaining gardens.</li> </ul>

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>5. LITERATURE/MATERIALS/AUDIOVISUALS</b>	
<ul style="list-style-type: none"> <li>▪ The purchase of FNS nutrition education/promotion materials that address FSNE topics for use with FSNE eligibles.</li> <li>▪ The purchase of other nutrition education materials, when there are no FNS materials available that address FSNE topics and will be used with FSNE eligibles.</li> <li>▪ The production of nutrition education materials, for which there is <u>no other existing comparable material</u>, which support the State's goals and objectives for FSNE and will be distributed to FSNE eligibles. It is encouraged that States collaborate with other FNS programs on the messages conveyed in and the costs of education materials. The State agency must describe the method used for allocating costs between the programs. <ul style="list-style-type: none"> <li>- Prior to production, materials must be reviewed and approved by <i>Network</i> staff, justified, and contain appropriate USDA acknowledgements.</li> </ul> </li> <li>▪ Fact sheets, brochures, newsletters, and calendars, etc. that are produced for distribution to FSNE eligibles and similar persons about nutrition topics such as food choices, food budgeting and food preparation.</li> <li>▪ Videos and websites, developed for use by FSNE eligibles, about nutrition education and related topics.</li> <li>▪ Materials targeted to intermediaries who deliver services to FSNE eligibles.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Any nutrition education literature paid for by another federal or private program or source.</li> <li>▪ Any material that endorses or promotes brand name products or retail stores.</li> <li>▪ Paying for manufacturer's or store (cents off) coupons.</li> <li>▪ Influencing a store's pricing policy.</li> <li>▪ Materials that do not give attribution to the FSNE Program.</li> <li>▪ Any audiovisual paid-in-full by a private third party or source and any audiovisual that endorses or promotes brand name products or retail stores.</li> <li>▪ Negative written, visual, verbal expressions about specific foods, beverages or commodities.</li> </ul>

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>6. MEDIA ACTIVITIES</b>	
<ul style="list-style-type: none"> <li>▪ Paid or public service radio and television commercials, or advertisements promoting healthy eating directed toward FSNE eligibles within the community.</li> <li>▪ Local media activities must be coordinated with and complementary to State campaign.</li> <li>▪ Local media activities must provide a justification as to why local media activities are reasonable and necessary, and provide the target audience income data that qualifies the activities for FSNE funding. All paid media costs and activities must target FSNE eligibles in qualified census tracts.</li> <li>▪ Public relations activities including media appearances, interviews, preparations of press releases and press kits, training of spokespersons, announcements publicizing community events, or resources for FSNE eligible persons.</li> <li>▪ Development of media materials requires prior approval from CPNS staff and the USDA and must display appropriate acknowledgements.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Media activities to promote or present nutritional messages to the general public, which are not targeted to the FSNE eligible population.</li> <li>▪ Creating media activities that make derogatory statements about a particular food, beverage, or commodity.</li> <li>▪ Developing media advertisements to promote non-FOOD STAMP program participation.</li> </ul>



<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>7. MEDICAL EQUIPMENT AND HEALTH SERVICES</b>	
<ul style="list-style-type: none"> <li>▪ Salaries and benefits of personnel to collect dietary intake data based on a 24 hour recall, food frequency questionnaires, or other assessment of nutrition knowledge and behaviors.</li>   <li>▪ Health promotion activities and interventions aimed at primary prevention of disease (prevent or postpone the onset of chronic disease) and designed to help FSNE eligibles establish and maintain active lifestyles and healthy eating habits.</li>   <li>▪ Clarify the role of health professionals such as physician, nurses, pharmacists, dentists and their time in providing FSNE services.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Medical equipment or health services related to health assessment of recipients; obtaining data on nutritional status, chronic disease, or chronic disease risk assessments. This includes obesity prevention and/or weight management programs, which are billable to MediCal or other medical insurance.</li>   <li>▪ Costs associated with the measurement of height, weight, skin fold thickness, blood pressure, cholesterol, blood-glucose and iron levels.</li>   <li>▪ Clinical health screenings (i.e., cholesterol testing, body mass index and blood glucose testing, etc).</li>   <li>▪ Medical Equipment. (e.g., scales, sphygmomanometer, skinfold calipers, glucometer).</li>   <li>Secondary prevention interventions and medical nutrition therapy. Secondary prevention interventions include activities that help people who already have a chronic disease cope with and control these conditions and prevent additional disability. Medical nutrition therapy involves the assessment of nutritional status and the assignment of diet, counseling, and/or specialized nutrition therapies to treat an individual's illness or condition.</li> </ul>

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>8. RESEARCH, EVALUATION AND NEEDS ASSESSMENTS,</b>	
<ul style="list-style-type: none"> <li>▪ Consumer and intermediary/market research and pilot testing of FSNE eligibles.</li> <li>▪ <i>Network</i> approved consultant services for research and evaluation expertise as linked to FSNE.</li> <li>▪ Conducting focus groups as an essential part of developing and testing targeted nutrition messages for the FSNE eligible audience. Expenses (e.g., meals, child care, and transportation) that are considered necessary and reasonable for services provided as a focus group participant.</li> <li>▪ Intercept surveys, key informant interviews, record audits, and community surveys of FSNE eligibles.</li> <li>▪ Telephone or mail surveys and the purchase of questions for surveys of FSNE eligibles.</li> <li>▪ Formative research for program planning and process, impact, and outcome evaluations of FSNE eligibles.</li> <li>▪ Funding for all surveillance/surveying activities must be prorated to reflect only the percentage of respondents at <u>130% of poverty or less</u> unless the surveillance/survey activity is directed to FSNE eligibles only.</li> <li>▪ Local evaluation projects should focus on evaluating FSNE activities and assessing the effectiveness of FSNE interventions in their scopes of work.</li> <li>▪ Assessments of consumer needs and access to healthy foods as an integral part of program planning to increase the effectiveness of FSNE interventions and strategies. The costs, however, must be minimal, reasonable and limited to the scope of the services.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Payment to subjects for their participation in research/evaluation studies.</li> <li>▪ Research that does not target FSNE eligibles.</li> <li>▪ Costs associated with surveillance or surveys of the general population that are not prorated based on the number of likely FSNE eligible respondents (persons with incomes less than or equal to 130% of poverty guidelines/thresholds, with certain exceptions).</li> <li>▪ Local community food security and needs assessments, except where such an activity is of minimal or no cost and is integral to general FSNE nutrition education program planning.</li> <li>▪ Use of “Changing the Scene” and the “School Health Index” with FSNE funds is unallowable based on these resources focusing on policy and environmental change.</li> </ul>

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>9. NUTRITION EDUCATION EVENTS/CLASSES</b>	
<ul style="list-style-type: none"> <li>▪ Participation in nutrition education activities/events does not require pro-rating of costs if your organization can demonstrate that at least 50% of the participants meet the 185% FPL targeting requirement. If this cannot be demonstrated, costs associated with the event must be prorated to the percent of the community that is at or below 130% FPL.</li> <li>▪ Structured, interactive educational and promotional events in community, cafeteria, and classroom settings. Settings (salaries, space, equipment, materials) for FSNE eligibles on nutrition related topics (e.g., food budgeting, preparation, safety). If nutrition education is included with other topics, only that portion of class pertaining to nutrition education is an allowable cost. Schools must be public government entities for in-kind charges.</li> <li>▪ The <i>pro rata</i> share of costs of classes that are provided to targeted groups in conjunction with another program (e.g., WIC), provided the local agency provides the interagency agreement that exists between the programs, and the method for allocating costs between the programs.</li> <li>▪ All activities that address the topic of breastfeeding must be planned and implemented in collaboration with WIC through an MOU. Breastfeeding activities must supplement existing WIC activities.</li> <li>▪ Promotion or marketing of the nutrition benefits of a Salad Bar Program.</li> <li>▪ Where operating in conjunction with existing programs, activities should enhance and/or supplement, not supplant them. For example, the cost for a home economics teacher to conduct an extracurricular cooking club for low-income teenagers could be allowable, while using FSNE funds to replace costs of routine nutrition school classes would constitute inappropriate supplanting of ongoing school curricula.</li> <li>▪ Local FSNE contractors wanting to implement a mini-grant</li> </ul>	<ul style="list-style-type: none"> <li>▪ Classes that are designed to provide case management or "life skills" training (e.g., parenting, child development, crisis management, rental information). Only that portion of the class related to nutrition education is allowable.</li> <li>▪ Medical nutrition therapy and secondary prevention interventions.</li> <li>▪ Breastfeeding education, promotion, and support that duplicates or otherwise is provided for under other funding sources such as WIC.</li> <li>▪ Physical activity/exercise classes, equipment, or facilities that are not part of a coordinated nutrition education project.</li> <li>▪ Weight loss classes, individualized meal plans, obesity treatment programs, etc.</li> <li>▪ Nutrition education costs that are charged to another Federal program (e.g., Team Nutrition, WIC, EFNEP, Head Start, etc.)</li> <li>▪ Incentive payments for class attendance.</li> <li>▪ Personal costs for recipients to attend nutrition education activities such as childcare and transportation services.</li> <li>▪ Personnel costs for staff to monitor students' food selections or other such activities within the realm of school food service. (Such as food service workers only encouraging fruit and vegetable intake in cafeteria as opposed to a more curriculum based cafeteria intervention).</li> <li>▪ Education for incarcerated or institutionalized persons that are not eligible for the Food Stamp Program (i.e., persons in jails, prisons, nursing homes, mental institutions, etc.)</li> <li>▪ Most able-bodied students ages 18 through 49 who are enrolled in college or other institutions of higher education at least half time are not eligible for the Food Stamp Program and therefore not eligible (130% of FPL) to receive FSNE. However, students may be able to get food stamp benefits if otherwise income eligible and they can meet one of the criteria listed below: <ul style="list-style-type: none"> <li>- Get public assistance benefits under Title IV-A Program; or</li> </ul> </li> </ul>

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<p>program must first get CPNS approval. (Mini-grant projects awarded by local FSNE contractors must be reviewed and approved by USDA prior to funding being allocated to any mini-grant project). Mini-grant projects must submit the following to CPNS for review and submittal to USDA: (1) description of the project, (2) targeting data, and (3) budget justification.</p> <ul style="list-style-type: none"> <li>▪ <i>Activities where the primary objectives pertain to allowable nutrition education but brief FSP outreach messages are also shared with FSNE participants. FSP information materials are available for free on the FNS web site at: <a href="http://www.fns.usda.gov/fsp/info.htm">http://www.fns.usda.gov/fsp/info.htm</a>.</i></li> </ul>	<ul style="list-style-type: none"> <li>- Take part in a State or federally financed work study program; or</li> <li>- Work at least 20 hours a week; or</li> <li>- Are taking care of a dependent household member under the age of 6; or are taking care of a dependent household members over age 5 but under age 12 and do not have adequate child care to enable them to attend school and work a minimum of 20 hours, or to take part in a State or Federally financed work study program; or</li> <li>- Are assigned to or placed in a college or certain other schools through: <ul style="list-style-type: none"> <li>• A program under the Workforce Investment Act of 1998; or</li> <li>• A program under Section 236 of the Trade Act of 1974; or</li> <li>• An employment and training program under the Food Stamp Act, or</li> <li>• An employment and training program operated by State or local government;</li> <li>• Also, a single parent enrolled full time in college and taking care of a dependent household member under the age of 12 can get food stamps if otherwise eligible.</li> </ul> </li> </ul>

<u><b>ALLOWABLE</b></u>	<u><b>UNALLOWABLE</b></u>
<b>10. NUTRITION EDUCATION REINFORCEMENT ITEMS (NERI)</b>	
<ul style="list-style-type: none"> <li>▪ Nutrition education reinforcement items are allowable costs only if they are deemed reasonable and necessary, contain a nutrition message, and are of nominal value (\$4 or less per item)</li> <li>▪ Examples of allowable reinforcement items are those that convey nutrition messages and provide cues to action: this includes refrigerator magnets, note pads, cooking items, (e.g., measuring cups, cutting mats, etc.) or other items of nominal value which reinforce an important nutrition behavior.</li> <li>▪ NERI designed for physical activity promotion must be provided in conjunction with relevant nutrition and physical activity messages (e.g., Frisbee, jump rope, visor).</li> </ul>	<ul style="list-style-type: none"> <li>▪ Purchase of nutrition education reinforcement items that do not contain nutrition messages.</li> <li>▪ Distribution of nutrition education reinforcement items with an individual cost of over \$4.</li> <li>▪ Celebratory items, and items designed primarily as staff morale boosters.</li> <li>▪ Any program incentive item intended for persons who are not FSNE eligibles.</li> </ul>

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>11. PHYSICAL ACTIVITY PROMOTION</b>	
<ul style="list-style-type: none"> <li>▪ Physical activity (PA) promotion only as a component of broader nutrition activities such as providing FSNE eligibles and similar low-income persons with information and encouragement to exercise is allowable. This may include 1) promotion of PA messages/PA recommendations contained in the USDA 2005 Dietary Guidelines for Americans, 2) PA demonstrations (instructional in nature, on a <u>one-time basis for clients or staff</u>), 3) provision of advice and 4) community resource information (such as a free local fitness event) in order to encourage program participants to engage in regular PA.  <p style="margin-left: 40px;">Note: For PA demonstrations at <i>Network</i> funded school districts, the <i>Network</i> and USDA have negotiated a pre-approved contract with SPARK (Sport, Play and Active Recreation) to conduct one-time demonstrations. If a school district is using FSNE funds to conduct a SPARK one-time demonstration, they must use the pre-approved contract for services and costs. School districts can use other vendors to conduct one-time demonstrations.</p> </li> <li>▪ FSNE staff may use FSNE funds to promote PA in the context of nutrition education, but may not use FSNE funds to develop stand-alone PA materials or projects.</li> <li>▪ Purchase/development of educational materials promoting PA and integrating PA into nutrition education for FSNE eligibles. All newly developed materials must have <i>Network</i> approval before final production. USDA prefers the utilization of existing materials when possible.</li> <li>▪ Walk to School events that are part of a larger nutrition education campaign.</li> <li>▪ PA education and promotion as part of nutrition education sessions in the Food Stamp Program <ul style="list-style-type: none"> <li>▪ Information on local sites where FSNE eligibles and other low-income persons can access a diverse range of low or no-cost activities appropriate for different ages and physical</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Ongoing exercise or PA classes,(e.g., yoga classes, walking clubs, sports teams, running classes, gym classes)</li> <li>▪ The implementation of PA environmental interventions, (i.e., PA community assessments, walkability workshops, development of community plans to improve walkability, and the implementation of any environmental improvements to increase neighborhood walkability).</li> <li>▪ Costs incurred for health club or gym memberships, dues, equipment, (e.g., bicycles, treadmills, stair steps, weights, etc.); facilities (rental or modifications); or exercise leaders for ongoing exercise classes.</li> <li>▪ Personnel costs for conducting or maintaining exercise or PA classes. (exception: one-time PA demonstration).</li> <li>▪ PA supplies for class participants are not allowable except for instructor demonstrations.</li> <li>▪ PA promotional materials developed without the <i>Network's</i> prior approval.</li> </ul>

<u><b>ALLOWABLE</b></u>	<u><b>UNALLOWABLE</b></u>
<p>abilities.</p> <ul style="list-style-type: none"> <li>▪ Physical activity bulletin boards or displays around the food stamp offices, clinics or community.</li> <li>▪ Referral to library or web site resources on physical activity.</li> <li>▪ Development and provision of information and resource lists to target audience.</li> <li>▪ A certified physical fitness professional should be consulted throughout the development phases of materials that contain PA content. The cost of such consultation is allowable if it is reasonable and necessary.</li> <li>▪ Purchase of educational materials that promote PA for FSNE eligibles. Examples of educational materials include brochures, newsletters, posters, public service announcements, and audiotapes, videotapes, and DVDs. These materials may be purchased or obtained free from reliable sources such as government organizations, PA associations, or other authorities on the subject.</li> </ul>	

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>12. SYSTEMS, POLICY AND ENVIRONMENTAL EDUCATION (CONSUMER EMPOWERMENT)</b>	
<ul style="list-style-type: none"> <li>FSNE funds may be used to promote, but not implement, systems, environmental, or policy change, if and only if such promotion is directly linked to, supportive of, and proportionate to direct nutrition education efforts for FSNE clients. FSNE staff may encourage <u>Food Stamp eligible</u> clients to pursue positive nutrition systems, environment, and policy changes, and provide them with a list of strategies to assist with this effort. (community empowerment).</li> <li>Systems, policy and environmental change may be included in projects if the activities are supportive and proportionate to direct nutrition education activities.</li> </ul>	<ul style="list-style-type: none"> <li>Any activity or material to lobby or influence Federal, State, or local officials to pass or sign legislation or to influence the outcomes of an election, referendum, or initiative. <ul style="list-style-type: none"> <li><i>Organized efforts to influence elected officials and lobby for legislative/policy changes.</i></li> </ul> </li> <li>Costs associated with <i>the establishment and maintenance of supporting and maintaining</i> environmental or <i>system policy</i> changes in the community, such as staffing, infrastructure, equipment, space, land, construction or supplies. <p>Costs for staff to participate in the development or implementation of school wellness policies. This is the case even if the State's Child Nutrition Program has taken the lead and this is a component of a State's Nutrition Action Plan.</p> <p>FSNE funds may not be used for implementation of initiatives and other resources which have the primary purpose of improving nutrition systems, environments, or policies. Examples of materials that promote systems and environmental changes that are inappropriate for FSNE include <i>Changing the Scene, the Healthier US School Challenge, and the School Health Index.</i></p> </li> </ul>



<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>13. PROFITS/REVENUES/FUND RAISING/GRANT WRITING</b>	
<ul style="list-style-type: none"> <li>▪ Sale of publications/nutrition education materials produced with FSNE funds. Publications/materials must be sold <u>at cost</u> (cost includes concept development, production, and distribution).</li> <li>▪ Any sales received by Contractor must be accounted for in a separate, identifiable account, reported to the State on SF-269 form, and used to meet agreed upon allowable programmatic needs of the Contractor, or the sale proceeds must be returned to the State.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Sale of publication/materials produced with USDA dollars to make a profit without prior approval from the <i>Network</i> and USDA.</li> <li>▪ Costs of organized fund raising/grant writing including financial campaigns, solicitation of gifts and bequests, and similar expenses incurred to raise capital or obtain contributions, regardless of the purpose for which the funds will be used.</li> </ul>

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>14. SPACE ALLOCATION</b>	
<ul style="list-style-type: none"> <li>▪ Space allocated for nutrition education programs in which the plan for the space/cost allocation is documented and actual out-of-pocket costs are incurred and tracked.</li> <li>▪ Space donated by local school districts, but only the cost of space based on depreciation or use allowance.</li> </ul>	<ul style="list-style-type: none"> <li>▪ State Match charges for space that is donated by a private third party or <u>public entity</u>, or costs that are fully funded by another program (e.g., USDA, WIC and EFNEP programs). For publicly owned space, amounts claimed under “rent” must represent actual costs of ownership and/or maintenance for the property, NOT the “fair market value” if the space was rented on the open market. For example, if a county or school district donated space to a program to use in the conduct of eligible nutrition education, and the county or school district was not incurring any ownership or maintenance costs for that space, no “fair market value” may be assigned to that space for the purposes of determining State Match contributions.</li> <li>▪ Commercial rental rates cannot be used for <del>publicly</del> government owned space.</li> </ul>

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>15. SOCIAL MARKETING CAMPAIGNS</b>	
<ul style="list-style-type: none"> <li>Local radio and television announcements of nutrition education events for FSNE eligibles. (See #6, MEDIA).</li> <li>Appropriate social marketing campaigns that target nutrition messages to FSNE eligibles and are delivered, with an approved exclusivity waiver, in areas/venues where at least 50 percent of persons have incomes, equal to or less than 185% FPL. Prior approval is required from CPNS staff and USDA.</li> </ul>	<ul style="list-style-type: none"> <li>Social marketing campaigns that target the general population. In some instances, prorated costs based upon numbers of likely Food Stamp Program eligibles (<math>\leq 130\%</math> of poverty) guidelines/threshold, with certain exceptions that will be reached with the campaign may be allowed.</li> <li>Nutrition education messages that convey negative message or disparage a specific foods, beverages, or commodity, or which are not consistent with the 2005 Dietary Guidelines for Americans <i>and My Pyramid</i>.</li> <li><i>Television and radio announcements/advertisements that do not include a brief message about FSP, its benefits and how to apply.</i></li> </ul>

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>16. STAFF TRAINING AND OTHER COSTS</b>	
<ul style="list-style-type: none"> <li>▪ Training (including travel expenses) for staff partners providing nutrition education to FSNE eligibles. Attendance must be justified in terms of the benefits to implementing the scope of work. Prior written authorization is required from the CPNS <i>Network</i> staff for any new training/travel not already listed on the approved budget.</li> <li>▪ Travel costs associated with <i>Network</i> business or to a <i>Network</i> sponsored training or event will be 100% reimbursed even if the person is not 100% FTE. However, travel costs must be prorated based on FTE if the conference is not <i>Network</i> sponsored, but qualifies as a nutrition education conference or training.</li> <li>▪ Participation in regional or state coalitions such as <i>Network</i> Regional Collaboratives, 5 a Day, etc. on FSNE business.</li> <li>▪ Nutrition education training materials.</li> <li>▪ Staff time spent planning, delivering and evaluating nutrition education to FSNE eligibles. Time must be charged at a rate commensurate with duties being performed.</li> <li>▪ FSNE-related training for program delivery staff (e.g., <i>Power Play!</i>, <i>Harvest of the Month</i>, <i>Community Health Leaders</i>, <i>Latino 5 a Day</i>).</li> <li>▪ The time volunteers of a public agency spend performing FSNE-specific duties. Time must be commensurate with the duties being performed. (This does not apply to nonprofit organizations).</li> <li>▪ FSNE support or partial sponsorship of meetings, conferences and summits must be pro-rated based on both the proportion of the target audience that represents FSNE eligibles and the proportion of the agenda related to nutrition for low-income audiences.</li> <li>▪ FSNE funds may be used to provide general briefings and trainings to community health professionals, if the State can</li> </ul>	<ul style="list-style-type: none"> <li>▪ Travel outside the State of California without prior written authorization from the CPNS <i>Network</i> staff. Attendance must be justified and travel request approved.</li> <li>▪ No more than four FSNE staff (including <i>Network</i>, DSS and UCCE state and local agencies) are allowed to travel for national-level conference, meeting or training, even when occurring in the State. Attendance must be justified and have prior USDA approval.</li> <li>▪ University level courses on technical or clinical subjects that are not relevant to the practical delivery of nutrition education to the target audience.</li> <li>▪ A physician's time spent distributing nutrition flyers at health fairs when charges are based on a rate commensurate with his/her credentials as opposed to the duties he/she is performing.</li> <li>▪ Costs of training materials that have not been reviewed/approved for use in FSNE.</li> <li>▪ Money, vouchers or passes provided to FSNE recipients in conjunction with FSNE activities.</li> <li>▪ Childcare or transportation services provided for FSNE recipients in conjunction with FSNE activities.</li> <li>▪ Substitute teachers costs for <i>Network</i> funded teachers while they are at <i>Network</i> or nutrition education trainings.</li> <li>▪ The time volunteers of a non-public agency (e.g., faith-based organizations, many food banks, etc.) spend performing FSNE specific duties.</li> <li>▪ Training or professional development costs of food service workers or others not directly associated with delivery of FSNE (e.g. Serve Safe Training).</li> <li>▪ Costs to support staff time or other expenditures related to participating in national-level work or committees, except where the activity is an integral part of FNS' focus on general FSNE</li> </ul>

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<p>demonstrate that such professionals serve a majority of FSNE eligibles.</p> <ul style="list-style-type: none"> <li>Funds spent on training, workshops, meetings, and summits should target FSNE eligibles or intermediaries working with FSNE eligibles. The primary focus must be nutrition education/healthy eating behaviors. A secondary focus (e.g, food shopping practices, safe handling, promoting healthy communities, etc.) can be included.</li> </ul> <p>Cost of institutional memberships in business, technical, and professional organizations. These costs must be consistent with the effort to promote the provision of quality nutrition services to FSNE eligibles.</p> <ul style="list-style-type: none"> <li></li> </ul> <p><i>Nutrition education activities that promote the selection of healthy foods from vending machines.</i></p>	<p>program planning. However, in general, costs associated with national-level committee work are not reasonable and necessary for the delivery of FSNE in States. USDA, FNS staff represent FSNE interests on national committees.</p> <ul style="list-style-type: none"> <li>Costs to support travel and other costs associated with the <i>Network's</i> participation in national committee meetings. This condition applies to national committee meetings for which USDA representation and participation are established at the federal level).</li> <li>Individual memberships in business, technical and professional organizations, e.g. ADA, Society for Nutrition Education.</li> </ul>

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>17. INCOME QUALIFICATIONS</b>	
<ul style="list-style-type: none"> <li>▪ Targeting, prospectively by site: Each intervention site must have specific income qualifying targeting data submitted for state and federal match.</li> <li>▪ Flea Market, farmers' markets, festivals, health fairs and other community events should be located in qualifying census tracts whenever possible. If not, survey data from the event can be used to qualify the site and prove targeting.</li> <li>▪ Participation in nutrition education activities/ events does not require pro-rating of costs if your organization can demonstrate that at least 50% of the participants meet the 185% FPL targeting requirements.</li> </ul>	

<u>ALLOWABLE</u>	<u>UNALLOWABLE</u>
<b>18. RETAIL, RESTAURANT AND WORKSITES</b>	
<ul style="list-style-type: none"> <li>▪ FSNE services in partnership with restaurants may only use FSNE funds to do so in restaurants that are both authorized to accept food stamps and located in geographic areas meeting the FSNE targeting criteria (e.g., at least 50% of their clients have gross incomes at or below 185% FPL).</li> <li>▪ Restaurant sites may participate in FSNE by serving as intervention sites, if these sites can demonstrate that at least 50% of their clients have gross incomes at or below 185% FPL. If such sites redeem food stamps, this would be further proof of the efficacy of these locations as venues for FSNE.</li> <li>▪ Worksite interventions (nutrition education) where you can verify that at least 50% of the employees are at or below 185% of FPL. This can be done by the census tract data of the site itself, proprietary data from employer if available, or means testing.</li> <li>▪ Per USDA Guidance, Regional Nutrition Networks (RNN) must provide retail interventions in qualifying census tracts ONLY. Retail interventions include comprehensive merchandising and promotional activities in supermarkets, small chain stores and independent (neighborhood) markets statewide in an effort to increase the purchase of fruits and vegetables among FSNE eligible Californians. The merchandising components of the program include customized point-of-purchase materials, in-store recipe booklets and recipe cards. Food demonstrations, store tours, and retail-sponsored community events are conducted to support the merchandising efforts as well. <ul style="list-style-type: none"> <li>○ The <i>Power Play Campaign</i> may host food demonstrations in those stores that are recruited and maintained by <i>African American, Latino</i> and <i>Core 1</i>. However, Food demos may <u>not</u> be held jointly and should be scheduled on different days and times to reinforce the <i>Power Play!</i> message at the point of</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ Restaurant partnerships with restaurants not accepting food stamps and not meeting the targeting criteria of 50% or more of the audience is at or below 185% FPL..</li> <li>▪ Retail site interventions not targeted to FSNE eligibles.</li> <li>▪ Worksites interventions not targeted to FSNE eligibles.</li> <li>▪ Hosting retail interventions in sites that do not meet the qualifying census criteria.</li> <li>▪ <i>African American, Latino</i> and <i>Core 1</i> may <u>not</u> merchandise or host food demonstrations in the same stores.</li> </ul>

<u><b>ALLOWABLE</b></u>	<u><b>UNALLOWABLE</b></u>
<p>purchase.</p> <ul style="list-style-type: none"> <li>○ As documented in the SOW, RNNs should work with LIAs. This may also include LIA crossover into the retail arena. RNNs and LIAs may host food demos in the same qualifying stores. However, Food demos may <u>not</u> be held jointly and should be scheduled on different days and times to reinforce the message at the point of purchase.</li> </ul>	



## **19. DEFINITIONS**

### **Focus of Food Stamp Nutrition Education:**

- Health promotion to help FSP eligibles establish healthy eating habits and a physically active lifestyle.
- Primary prevention of disease to help FSP eligibles that have risk factors for diet-related chronic disease prevent or postpone the onset of disease by establishing more physically active lifestyle and healthier eating habits.

<b>Dietary Quality</b>	Applies to the nutritional value of food acquired and how well overall diets of food stamp eligibles compare to the current Dietary Guidelines for Americans and USDA Food Guidance System. Physical activity falls within this element with certain restrictions (see Appendix C for more information).
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### **Nutrition Education Key Behavioral Outcomes**

*Eat fruits and vegetables, whole grains and fat-free or low-fat milk products every day.*

*Be physically active every day as part of a healthy lifestyle.*

*Balance Caloric intake from food and beverages with calories expended.*

### **Reasonable and necessary costs:**

Costs that may be covered by the FSP for nutrition education must also meet a “reasonable and necessary” test.

<b>Reasonable Costs</b> <ul style="list-style-type: none"><li>▪ Provide a program benefit generally commensurate with the costs incurred,</li><li>▪ Are in proportion to other program costs for the function that the costs serve,</li><li>▪ Are a priority expenditure relative to other demands on availability of administrative resources, and</li><li>▪ Carry constructive nutrition education messages consistent with the Dietary Guidelines for Americans.</li></ul>	<b>Necessary Costs</b> <ul style="list-style-type: none"><li>▪ Are incurred to carry out essential functions,</li><li>▪ Cannot be avoided without adversely affecting program operations, and</li><li>▪ Do not duplicate existing efforts</li></ul>
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## 20. TARGET AUDIENCE FOR FSNE

Audience	Likelihood of Reaching Food Stamp Eligibles	Examples	Waiver Needed*
<p><b>Certified Eligibles</b> Includes persons currently participating in or applying for the FSP and/or persons residing in a FSP household. This is the known FSP target audience.</p>	<p>FSNE activities delivered to this audience clearly benefit FSP eligibles.</p>	<ul style="list-style-type: none"> <li>▪ Persons referred by the local FSP office.</li> <li>▪ Persons reached through direct marketing to FSP participants.</li> <li>▪ Persons participating in the Food Distribution Program on Indian Reservations (FDPIR)</li> <li>▪ Ineligible parents who receive FSP benefits on behalf of their child.</li> <li>▪ FSP participants in a FSP Job Readiness Training Program.</li> </ul>	<p>No</p>
<p><b>Likely Eligibles as Established by Proxy Criteria</b></p> <p>A. By income. Persons not falling into category 1 above that have gross incomes at or below 130% of poverty guidelines. This criterion does <b>not</b> include persons typically ineligible for the FSP (e.g., incarcerated persons, boarders, or college/university students).</p> <p>B. By Location. Persons receiving FSNE at:</p> <ul style="list-style-type: none"> <li>• FSP/TANF offices</li> <li>• Public housing</li> <li>• Food banks, food pantries and soup kitchens in conjunction with the distribution of foods to needy persons at these sites.</li> </ul>	<p>FSNE activities delivered to this audience are very likely to benefit FSP eligibles. For the income-based proxy, partnerships are needed with other programs that have formal means-tested certification processes and/or similar income participation criteria. These partnerships will involve the implementation of a referral procedure that is based on income eligibility criteria.</p>	<p>Income eligible persons (130% of poverty guidelines) referred by WIC, Medicaid, or Child Nutrition Programs.</p> <ul style="list-style-type: none"> <li>▪ Persons receiving Supplemental Security Income (SSI) or Temporary Assistance for Needy Families (TANF)</li> <li>▪ Persons participating in TANF Job Readiness Training Program.</li> </ul> <ul style="list-style-type: none"> <li>▪ Persons in a TANF office waiting area or conference room.</li> <li>▪ Persons at a public housing apartment community room or lobby</li> <li>▪ Persons visiting a food pantry to obtain food.</li> <li>▪ Persons receiving a meal at a soup kitchen.</li> </ul>	<p>No</p>

<p><b>Potentially Eligible by Site/Location</b></p> <p>Persons at venues when it can be documented that the location/venue serves generally low-income persons where at least 50% of persons have gross incomes at or below 185% of poverty guidelines/ thresholds.</p>	<p>FSNE activities delivered to this audience provide a fair likelihood of benefiting FSP eligibles by providing services in sites/ locations primarily frequented by a low-income audience. This audience may be served when it is not possible or practical to separate out Program eligibles and/or identify Program eligibility (e.g., social marketing campaigns). FSNE delivered to this audience should still be designed to meet the needs of FSP eligibles.</p>	<p>Persons residing in census tract areas where at least 50% of persons have gross incomes that are equal to or less than 185% of the poverty threshold.</p> <ul style="list-style-type: none"> <li>▪ Children in schools where at least 50% of children receive free and reduced priced meals.</li> <li>▪ Persons participating in the WIC program.</li> <li>▪ Persons shopping in grocery stores located in census tracts where at least 50% of persons have gross incomes that are equal to or less than 185% of the poverty threshold.</li> </ul>	<p>Yes</p>
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### Definitions

~~Nutrition Education Core Elements: Four core elements outline the topical areas of FSNE. States should focus on these core elements when preparing their annual plan for nutrition education. States should especially emphasize the core element Dietary Quality and address it in a comprehensive manner. FNS is particularly interested in efforts directed at increasing the consumption of fruits and vegetables in Food Stamp Program eligible population and interventions and activities that promote healthy weight through the balance of healthy eating and active living.~~

Core Element	Definition
Dietary Quality	<del>Applies to the nutritional value of food acquired and how well overall diets of food stamp eligibles compare to the current Dietary Guidelines for Americans and USDA Food Guidance System. Physical activity falls within this element with certain restrictions.</del>
Shopping Behavior/ Food Resource Management	<del>Applies to the practices related to thrifty shopping for and management of food dollars. These include such skills as making shopping lists, reading labels for nutritional value, planning menus and basic cooking.</del>
Food Security	<del>Applies to the general well being of a household in terms of assured access to an adequate supply of food at all times in order to support a healthy, active life. This includes a readily available supply of nutritious and safe foods and the assured ability to acquire these foods in a socially acceptable manner. Promotion of participation in the Food Stamp Program to eligible nonparticipating persons as part of nutrition education is a critical aspect of this element.</del>
Food Safety	<del>Applies to how food is handled. For example, it deals with issues such as hand washing, the length of time food may be left without refrigeration, the temperature at which food should be stored and whether food is properly and fully cooked.</del>

~~Reasonable and necessary costs:~~

~~Costs that may be covered by the FSP for nutrition education must also meet a “reasonable and necessary” test.~~

~~Reasonable Costs~~

- ~~—Provide a program benefit generally commensurate with the costs incurred;~~
- ~~—Are in proportion to other program costs for the function that the costs serve;~~
- ~~—Are a priority expenditure relative to other demands on availability of administrative resources; and~~
- ~~—Carry constructive nutrition education messages consistent with the Dietary Guidelines for Americans.~~

~~Necessary Costs~~

- ~~—Are incurred to carry out essential functions;~~
- ~~—Cannot be avoided without adversely affecting program operations; and~~
- ~~—Do not duplicate existing efforts~~

## 20. TARGET AUDIENCE FOR FSNE

Audience	Likelihood of Reaching Food Stamp Eligibles	Examples	Waiver Needed*
<p><b>Certified Eligibles</b> Includes persons currently participating in or applying for the FSP. This is the known FSP target audience.</p>	<p>FSNE activities delivered to this audience clearly benefit FSP eligibles.</p>	<p>—Persons referred by the local FSP office. —Persons reached through direct marketing to FSP participants. —Persons participating in the Food Distribution Program on Indian Reservations (FDPIR)</p>	<p>No</p>
<p><b>Likely Eligibles</b> Persons not falling into category 1 above that have gross incomes at or below 130% of poverty guidelines. It does not include persons typically ineligible for the FSP (e.g., incarcerated persons, boarders, or college/university students). This is a proxy measure of FSP eligibility for FSNE.</p>	<p>FSNE activities delivered to this audience are very likely to benefit FSP eligibles. Partnerships are needed with other programs that have formal means tested certification processes and/or similar income participation criteria.</p>	<p>Income eligible persons referred by WIC, Medicaid, Head Start or Child Nutrition Programs. —Persons receiving Supplemental Security Income (SSI) or Temporary Assistance for Needy Families (TANF)</p>	<p>No</p>
<p><b>Potentially Eligible by Site/Location</b> Persons at venues serving generally low income persons where at least 50% of persons have gross incomes at or below 185% of Federal poverty level. (FPL)</p>	<p>FSNE activities delivered to this audience provide a fair likelihood of benefiting FSP eligibles by providing services in sites/locations primarily frequented by a low income audience. This audience may be used when it is not possible or practical to separate out Program eligibles and/or identify Program eligibility (e.g., social marketing campaigns). FSNE delivered to this audience should still be designed to meet the needs of FSP eligibles.</p>	<p>Persons residing in census tract areas where at least 50% of persons have gross incomes that are equal to or less than 185% of FPL. —Children in schools where at least 50% of children receive free and reduced priced meals. —Persons participating in the WIC program.</p>	<p>Yes</p>